

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

C.D.A., minor child, and Mr. A., his father;
and E.A.Q.A., minor child, and Mr. Q., his
father,

Plaintiffs,

v.

United States of America,

Defendant.

Civil Action No. 21-469

**JOINT STIPULATED MOTION FOR A FIFTEEN DAY EXTENSION OF
TIME FOR PLAINTIFFS TO OPPOSE DEFENDANT'S MOTION TO
DISMISS THE AMENDED COMPLAINT**

The parties jointly move the Court for an order granting Plaintiffs a fifteen (15) day extension to oppose Defendant's motion to dismiss the Amended Complaint. In support of this motion, the parties respectfully state the following:

1. On January 28, 2022, Plaintiffs filed an Amended Complaint against Defendant, the United States of America. (Doc. No. 31.)
2. On February 7, 2022, the Court issued a scheduling order setting March 14, 2022 as the deadline for Defendant to respond to the Amended Complaint. (Doc. No. 33.)
3. On March 3, 2022, Defendant moved unopposed for an extension of time to file a response to the Amended Complaint. (Doc. No. 34.)

4. On March 4, 2022, the Court granted Defendant's unopposed motion for an extension of time and issued a scheduling order setting March 27, 2022 as the deadline for Defendant to respond to the Amended Complaint and April 27, 2022 as the deadline by which Plaintiffs shall file any reply. (Doc. No. 35.)
5. On March 28, 2022, Defendant filed a motion to dismiss Plaintiffs' Amended Complaint. (Doc. No. 52.)
6. Plaintiffs respectfully move the Court for an order granting Plaintiffs a fifteen (15) day extension to oppose Defendant's motion to dismiss, setting Plaintiffs' deadline to file its opposition as on or before May 12, 2022 and Defendant's deadline to file any reply as on or before May 26, 2022. The parties request that oral argument be rescheduled at the Court's convenience.
7. Counsel for Plaintiffs and the United States have conferred regarding this request and agreed to jointly move the Court for a fifteen (15) day extension of time for Plaintiffs to oppose Defendant's motion to dismiss. A proposed Order is submitted herewith.

Dated: April 15, 2022

Respectfully submitted,

/s/ Karen L. Hoffmann

Karen L. Hoffmann

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[PROPOSED] ORDER

AND NOW, this _____ day of April, 2022, after considering the stipulation for a fifteen (15) day extension of Plaintiffs' time to oppose Defendant's motion to dismiss the Amended Complaint jointly executed by the parties, it is hereby **ORDERED** that the joint stipulation is **APPROVED**. Plaintiffs will have until May 12, 2022 to file their opposition to Defendant's motion to dismiss and Defendant will have until May 26 to file its reply.

BY THE COURT:

EDWARD G. SMITH, J.